FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

KMJ Enterprises, Inc.
720 Ransdell Road
Lebanon, IN 46052

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F011-11070-00026	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Volatile Organic Compound (VOC) Usage

D.2.8 Reporting Requirements

Certification Form
Emergency/Deviation Form
Quarterly Report Form
Quarterly Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source, operation of heatset web offset printing press operation.

Authorized individual:	Sean Kutz
Source Address:	720 Ransdell Road, Lebanon, IN 46052
Mailing Address:	P.O. Box 647, Lebanon, IN 46052
Phone Number:	765-482-4082
SIC Code:	2752
County Location:	Boone
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) half web press and dryer, (ID Press #1), with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer#1, as control, and exhausting to stack 1; and

(b) One (1) web press and dryer, (ID Press #2), with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer#2, as control, and exhausting to stack 2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of temperature at any part of the unit or its control device, the instrument employed shall have a scale such that deviations of plus or minus 28 degrees Celsius around the expected normal reading shall be easily documented and be accurate within plus or minus one percent (±1%) in degrees Celsius.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
(a) One (1) half web press and dryer, (ID Press #1), with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as #1, as control, and exhausting to stack 1.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds [326 IAC 2-8-4]

The total volatile organic compounds (VOC) delivered to the applicators of the one (1) half web press and dryer, (ID Press #1) shall be limited such that the combined controlled VOC emissions from Press #1 and Press #2 from Section D.2 will be less than 100 tons per twelve (12) consecutive month period, based on:

(a) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1). The following formula shall be used to determine VOC emissions from the press:

VOC (Tons/Year) = Maximum Coverage pounds per $MMin^2$ * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Controlled VOC (Tons/Year) = Maximum Coverage pounds per $MMin^2$ * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds * (1- Control Efficiency)

Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 Minimum Catalyst Inlet Temperature and Air Flow Rate [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, the one (1) natural gas fired catalytic oxidizer identified as catalytic oxidizer #1 shall operate with a minimum temperature of 650^{o} F or a temperature established during the latest stack test. This minimum temperature is a permit limit requiring certification by General Condition B.11. Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.4 Catalytic Oxidizers

The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizers, identified as #1 used in conjunction with the one (1) half web press and dryer, (ID Press #1) continuously when the heatset web offset printing press is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer #1, shall be maintained at a minimum temperature of 650^{o} F or a temperature established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(a) The quantity of VOC containing material used, including purchase orders, invoices, or other supplier documentation necessary to verify the type and amount used;

(b) The VOC content of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and

(d) The following operation parameters of each catalytic oxidizer:

(1) Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) temperature readings.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
(a) One (1) web press and dryer, (ID Press #2), with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as #2, as control, and exhausting to stack 2.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 Volatile Organic Compounds [326 IAC 2-8-4]

The total volatile organic compounds (VOC) delivered to the applicators of the one (1) web press and dryer, (ID Press #2) shall be limited such that the combined controlled VOC emissions from Press #1 from Section D.1 and Press #2 will be less than 100 tons per twelve (12) consecutive month period, based on:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2). The following formula shall be used to determine VOC emissions from the press:

VOC (Tons/Year) = Maximum Coverage pounds per $MMin^2$ * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Controlled VOC (Tons/Year) = Maximum Coverage pounds per $MMin^2$ * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds * (1- Control Efficiency)

Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.2.5 Minimum Catalyst Inlet Temperature and Air Flow Rate [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, the one (1) natural gas fired catalytic oxidizer identified as catalytic oxidizer #2, shall operate with a minimum temperature of 550° F or a temperature established during the latest stack test. This minimum temperature is a permit limit requiring certification by General Condition B.11. Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

Testing Requirements [326 IAC 2-8-4(3)]

D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing for overall control efficiency (capture and destruction efficiency) on the one (1) web press and dryer, (ID Press #2) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Catalytic Oxidizers

The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizer, identified as #2 used in conjunction with the one (1) web press and dryer, (ID Press #2), continuously when the heatset web offset printing press is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer #2, shall be maintained at a minimum temperature of 550° F or a temperature established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.4 and D.2.5.

(a) The quantity of VOC containing material used, including purchase orders, invoices, or other supplier documentation necessary to verify the type and amount used;

(b) The VOC content of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and

(d) The following operation parameters of each catalytic oxidizer:

(1) Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) temperature readings.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: KMJ Enterprises, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: P.O. Box 647, Lebanon, IN 46052
FESOP No.: F011-11070-00026

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify)

9 Report (specify)

9 Notification (specify)

9 Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: KMJ Enterprises, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: P.O. Box 647, Lebanon, IN 46052
FESOP No.: F011-11070-00026

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:
Title / Position:
Date:
Phone:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: KMJ Enterprises, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: P.O. Box 647, Lebanon, IN 46052
FESOP No.: F011-11070-00026
Facility: heatset web offset printing press operation
Parameter: VOC
Limit: Controlled VOC emissions will be less than 100 tons per twelve (12) consecutive months period, based on:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2).

(b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: KMJ Enterprises, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: P.O. Box 647, Lebanon, IN 46052
FESOP No.: F011-11070-00026

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By:
Title/Position:
Date:
Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a FESOP

Source Name: KMJ Enterprises, Inc.
Source Location: 720 Ransdell Road, Lebanon, IN 46052
County: Boone
SIC Code: 2752
Operation Permit No.: F011-11070-00026
Permit Reviewer: Phillip Ritz/EVP

On August 20, 1999, the Office of Air Management (OAM) had a notice published in the Lebanon Reporter, Lebanon, Indiana, stating that KMJ Enterprises, Inc., had applied for a FESOP to operate a heatset web offset printing press operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 15, 1999, Laura Krejchi of Cornerstone Environmental submitted comments on behalf of KMJ Enterprises, Inc., on the proposed FESOP. The summary of the comments and corresponding responses is as follows:

Comment 1

Condition D.1.3 requires testing for the new press (Press #2) but it does not specifically state what is being tested for. We would like a definite statement in this condition stating ". . . the Permittee shall perform VOC testing on the one (1) web press and dryer to show compliance with the overall control efficiency described by this permit, utilizing . . . " or equivalent. We would like it stated that they are testing for the overall control efficiency so when the time comes there is no debate about what exactly is being tested.

Response 1

The Testing Requirements Condition D.1.3, now Condition D.2.6, have been revised to require testing for overall control efficiency (capture and destruction efficiency).

D.~~1.3~~**2.6** Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing **for overall control efficiency (capture and destruction efficiency)** on the one (1) web press and dryer, (ID Press #2) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Comment 2

Condition D.1.5 (d)(5) requires "continuous or intermittent air flow rate readings." We feel that this is undue testing for KMJ and that this requirement should not be a requirement of the permit. Due to the lack of credible evidence requiring this condition, we are requesting this condition be removed from the FESOP.

Response 2

Parameters that are established only during the stack test, and those parameters not necessary for compliance monitoring, have been removed from the recordkeeping requirements. The changes to Condition D.1.5 are as follows:

(d) The following operation parameters of each catalytic oxidizer:

~~(1) VOC capture efficiency;~~

~~(2) VOC destruction efficiency of the control device;~~

~~(3) A description of the data used to establish the capture and destruction efficiencies; and~~

~~(4)~~**(1)** Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) temperature readings.

~~(5) Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) air flow rate readings.~~

Comment 3

An affidavit of construction was completed for the interim construction permit for the new press. Will another affidavit be required after the press has finished construction? If so, please include a copy of the affidavit with the permit.

Response 3

An affidavit of construction has been drafted for KMJ Enterprises, Inc., and will be included with the issued permit.

Comment 4

If possible, please combine pages 30 and 31 of the permit into a one page form.

Response 4

The FESOP Quarterly Report on pages 30 and 31 of 32 of the public noticed permit, now on page 33 of 34 of the permit, has been combined to fit onto one page.

Comment 5

KMJ has an Agreed Order adopted on September 16, 1992 requiring that the catalyst beads on the control device #1 are sampled and laboratory analyzed every 6 months. Will this still be a requirement after the issuance of the FESOP? Does the FESOP supercede this requirement? Again, we feel this is undue testing for KMJ and we are suggesting that they no longer need to complete this requirement.

Response 5

KMJ Enterprises, Inc. can request termination of the Agreed Order A-1578 from IDEM's Office of Enforcement. It cannot be terminated through this permitting process. Therefore, there is no change due to this comment.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1) In section D.1.1 the formula for determining the VOC emissions from the presses has been added. The changes to Condition D.1.1 are as follows:

The following formula shall be used to determine VOC emissions from the press:

VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Controlled VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds * (1- Control Efficiency)

2) Section D.1, under Facility Description, the numbering in the Facility Description has been corrected to remove the second (a) from the facility description.

3) To clarify that Section D.1 contains the operation conditions for the one (1) web press and dryer, (ID Press #2) section D.2 contains the construction conditions for the one (1) web press and dryer, (ID Press #2), the following language has been added to the permit:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) half web press and dryer, (ID Press #1), with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as #1, as control, and exhausting to stack 1.

~~(a) One (1) web press and dryer, (ID Press #2), with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as #2, as control, and exhausting to stack 2.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds [326 IAC 2-8-4]

The total volatile organic compounds (VOC) delivered to the applicators of the one (1) half web press and dryer, (ID Press #1) ~~and the one (1) web press and dryer, (ID Press #2)~~ shall be limited such that ~~it's~~ **the combined** controlled VOC emissions **from Press #1 and Press #2 from Section D.2** will be less than 100 tons per twelve (12) consecutive month~~s~~ period, based on:

(a) ~~95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2), and~~

~~(b)~~ 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1). **The following formula shall be used to determine VOC emissions from the press:**

VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Controlled VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds * (1- Control Efficiency)

Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 Minimum Catalyst Inlet Temperature and Air Flow Rate [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, the ~~two (2)~~ **one (1)** natural gas fired catalytic oxidizer~~s~~ identified as catalytic oxidizer #1 ~~and #2, respectively~~, shall operate with a minimum temperature of 650° F ~~and 550° F, respectively,~~ or a temperature established during the latest stack test, ~~and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test~~. This minimum temperature is a permit limit requiring certification by General Condition B.11. Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

~~During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the one (1) web press and dryer, (ID Press #2) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.4 Catalytic Oxidizers

The Permittee shall record the combustion chamber temperature of the ~~two (2)~~**one (1)** catalytic oxidizers, identified as #1 ~~and #2~~ used in conjunction with the one (1) half web press and dryer, (ID Press #1) ~~and the one (1) web press and dryer, (ID Press #2),~~ continuously when the heatset web offset printing press~~es are~~ **is** in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer~~s~~ #1 ~~and #2~~, shall be maintained at a minimum temperature of 650° F ~~and 550° F, respectively~~, or a temperature established during the latest stack test~~, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test~~. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with ~~(1)~~**(a)** through ~~(6)~~**(d)** below. Records maintained for ~~(1)~~**(a)** through ~~(6)~~**(d)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(a) The quantity of VOC containing material used, including purchase orders, invoices, or other supplier documentation necessary to verify the type and amount used;

(b) The VOC content of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and

(d) The following operation parameters of each catalytic oxidizer:

~~(1) VOC capture efficiency;~~

~~(2) VOC destruction efficiency of the control device;~~

~~(3) A description of the data used to establish the capture and destruction efficiencies; and~~

~~(4)~~**(1)** Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) temperature readings.

~~(5) Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) air flow rate readings.~~

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
(a) One (1) web press and dryer, (ID Press #2), with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as #2, as control, and exhausting to stack 2.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 Volatile Organic Compounds [326 IAC 2-8-4]

The total volatile organic compounds (VOC) delivered to the applicators of the one (1) web press and dryer, (ID Press #2) shall be limited such that the combined controlled VOC emissions from Press #1 from Section D.1 and Press #2 will be less than 100 tons per twelve (12) consecutive month period, based on:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2). The following formula shall be used to determine VOC emissions from the press:

VOC (Tons/Year) = Maximum Coverage pounds per $MMin^2$ * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

Controlled VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds * (1- Control Efficiency)

Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.2.5 Minimum Catalyst Inlet Temperature and Air Flow Rate [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, the one (1) natural gas fired catalytic oxidizer identified as catalytic oxidizer #2, shall operate with a minimum temperature of 550^o F or a temperature established during the latest stack test. This minimum temperature is a permit limit requiring certification by General Condition B.11. Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

Testing Requirements [326 IAC 2-8-4(3)]

D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the one (1) web press and dryer, (ID Press #2) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Catalytic Oxidizers

The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizer, identified as #2 used in conjunction with the the one (1) web press and dryer, (ID Press #2), continuously when the heatset web offset printing press is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer #2, shall be maintained at a minimum temperature of 550^o F or a temperature established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.4 and D.2.5.

(a) The quantity of VOC containing material used, including purchase orders, invoices, or other supplier documentation necessary to verify the type and amount used;

(b) The VOC content of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and

(d) The following operation parameters of each catalytic oxidizer:

(1) Continuous or intermittent (minimum once per shift - not to exceed an 8 hour period) temperature readings.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following revisions have been made to the TSD (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

1) The Limited Potential to Emit Table on page 3 of 6 of the TSD, has been edited to correct the total VOC emissions from the source. The changes to the TSD are as follows:

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
One (1) half web press and dryer, (ID Press #1)	0.00	0.00	0.00	6.32	0.00	0.00	0.09
One (1) web press and dryer, (ID Press #2)	0.00	0.00	0.00	12.01	0.00	0.00	0.00
Insignificant Activities	0.05	0.05	0.00	0.03	0.52	0.61	0.00
Total Emissions	0.05	0.05	0.00	~~99.00~~ **18.37**	0.52	0.61	0.09

***** Presses #1 and #2 will be controlled by the catalytic oxidizers, #1 and #2, respectively.
The two (2) catalytic oxidizers will have a control efficiency of 95%.

2) The Compliance Requirements on page 5 of 6 of the TSD, have been edited to reflect the updated Sections D.1 and D.2.

(a) The one (1) half web press and dryer, (ID Press #1) ~~and the one (1) web press and dryer, (ID Press #2)~~ has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall record the combustion chamber temperature of the ~~two (2)~~**one (1)** catalytic oxidizers, identified as #1 ~~and #2~~ used in conjunction with the one (1) half web press and dryer, (ID Press #1) ~~and the one (1) web press and dryer, (ID Press #2),~~ continuously when the heatset web offset printing press~~es~~ ~~are~~ **is** in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer~~s~~ #1 ~~and #2~~, shall be maintained at a minimum temperature of 650° F ~~and 550° F, respectively~~, or a temperature established during the latest stack test, ~~and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test~~. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the catalytic oxidizers for the one (1) half web press and dryer, (ID Press #1) ~~and the one (1) web press and dryer, (ID Press #2)~~ must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

(b) The one (1) web press and dryer, (ID Press #2) has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall record the combustion chamber temperature of the one (1) catalytic oxidizer, identified as #2 used in conjunction with the the one (1) web press and dryer, (ID Press #2), continuously when the heatset web offset printing press is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer #2, shall be maintained at a minimum temperature of 550° F or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,240 acfm or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the catalytic oxidizer for the one (1) web press and dryer, (ID Press #2) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	KMJ Enterprises, Inc.
Source Location:	720 Ransdell Road, Lebanon, IN 46052
County:	Boone
SIC Code:	2752
Operation Permit No.:	F011-11070-00026
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a FESOP application from KMJ Enterprises, Inc. relating to the operation of a heatset web offset printing press operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) half web press and dryer, (ID Press #1), with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1, as control, and exhausting to stack 1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) One (1) web press and dryer, (ID Press #2), with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting to stack 2.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP011-2057-00026, issued on January 6, 1993.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 23, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 3.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.05
PM-10	0.05
SO_2	0.00
VOC	103.95
CO	0.52
NO_x	0.61

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Naphthalene	0.09
TOTAL	0.09

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

(a) The source has accepted a federally enforceable limit on potential to emit VOC of less than 99 tons per twelve (12) consecutive months period, consisting of:

(i) 18.33 tons per year for the significant activities; and

(ii) 0.03 tons per year for the insignificant activities.

(b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
One (1) half web press and dryer, (ID Press #1)	0.00	0.00	0.00	6.32	0.00	0.00	0.09
One (1) web press and dryer, (ID Press #2)	0.00	0.00	0.00	12.01	0.00	0.00	0.00
Insignificant Activities	0.05	0.05	0.00	0.03	0.52	0.61	0.00
Total Emissions	0.05	0.05	0.00	99.00	0.52	0.61	0.09

***** Presses #1 and #2 will be controlled by the catalytic oxidizers, #1 and #2, respectively.
The two (2) catalytic oxidizers will have a control efficiency of 95%.

County Attainment Status

The source is located in Boone County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Boone County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ). The printing press is not a rotogravure printer.

(b) The one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820, Subpart KK). The source is not a major source for HAPs and the printing process is not rotogravure or flexographic.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration) because the source is located in Boone County, the federally enforceable limited potential to emit of any pollutant is less than 250 tons per year, and the source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in Boone County and the potential to emit any regulated pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). The total volatile organic compounds (VOC) delivered to the applicators of the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its VOC emissions will be less than 100 tons per twelve (12) month consecutive period. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the one (1) web press and dryer, (ID Press #2) shall be that VOC emissions shall be controlled by the catalytic oxidizer, identified as #2, with a capture efficiency of 100% and a control efficiency of 95%, and the temperature of the discharge gas shall not be less than 550EF (or a temperature determined in the stack tests to effect at least 95% destruction of capture volatile organic compounds).

(b) Pursuant to CP 011-2057-00026, issued on January 6, 1993, capture efficiency for the one (1) half web press and dryer, (ID Press #1) shall be at least 75%. This efficiency, combined with the destruction efficiency of 95%, will assure an overall control efficiency of at least 68%. That temperature of discharge gas shall not be less than 650EF (or a temperature determined in the stack tests to effect at least 95% destruction of capture volatile organic compounds). Proper operation of the capture system and catalytic incinerator, as verified by satisfaction of this condition, shall constitute Best Available Control Technology for this press and shall be deemed to satisfy the requirements of 326 IAC 8-1-6.

326 IAC 8-5-5 (Graphic Arts Operations)

The heatset web offset printing press is not subject to 326 IAC 8-5-5 (Graphic Arts Operation). This rule applies to packaging rotogravure, publication rotogravure and flexographic printing sources.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall record the combustion chamber temperature of the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), continuously when the heatset web offset printing presses are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizers #1 and #2, shall be maintained at a minimum temperature of 650^{o} F and 550^{o} F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the catalytic oxidizers for the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this heatset web offset printing press operation shall be subject to the conditions of the attached proposed **FESOP No.: F011-11070-00026.**

Appendix A: Emission Calculations

Company Name: KMJ Enterprises, Inc.
Address City IN Zip: 720 Ransdell Road, Lebanon, IN 46052
FESOP: F011-11070-00026
Reviewer: PR/EVP
Date: 06/23/99

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	One (1) half web press and dryer, (ID Press #1)	One (1) half web press and dryer, (ID Press #2)	Natural Gas Combustion	**TOTAL**
PM	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.05	0.05
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.61	0.61
VOC	35.83	68.09	0.03	103.95
CO	0.00	0.00	0.52	0.52
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.				

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	One (1) half web press and dryer, (ID Press #1)	One (1) half web press and dryer, (ID Press #2)	Natural Gas Combustion	**TOTAL**
PM	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.05	0.05
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.61	0.61
VOC	6.32	12.01	0.03	18.36
CO	0.00	0.00	0.52	0.52
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: KMJ Enterprises, Inc.
Address City IN Zip: 720 Ransdell Road, Lebanon, IN 46052
FESOP: F011-11070-00026
Reviewer: PR/EVP
Date: 06/23/99

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #1	1260	20	158941

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Percent Retained in Rag	Capture System Capture Efficiency	Thermal Oxidizer Destruction Efficiency	Emissions* (TONS/YEAR)	Controlled Emissions (TONS/YEAR)
Inks	1.018	48%	80.00%	158941	0.00%	100.00%	95.00%	31.07	1.55
Cleaning	0.07199999999999999	100%	80.00%	158941	0.00%	0.00%	0.00%	4.58	4.58
Fountain	0.1	3%	80.00%	158941	0.00%	0.00%	0.00%	0.19	0.19
		0%	0.00%	158941	0.00%	0.00%	0.00%	0.00	0.00

Total Uncontrolled VOC Emissions =	**35.83 Ton/yr**
Total Controlled VOC Emissions =	**6.32 Ton/yr**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #1	1260	38	301989

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Percent Retained in Rag	Capture System Capture Efficiency	Thermal Oxidizer Destruction Efficiency	Emissions* (TONS/YEAR)	Controlled Emissions (TONS/YEAR)
Inks	1.018	48%	80.00%	301989	0.00%	100.00%	95.00%	59.03	2.95
Cleaning	0.07199999999999999	100%	80.00%	301989	0.00%	0.00%	0.00%	8.70	8.70
Fountain	0.1	3%	80.00%	301989	0.00%	0.00%	0.00%	0.36	0.36
		0%	0.00%	301989	0.00%	0.00%	0.00%	0.00	0.00

Total Uncontrolled VOC Emissions =	**68.09 Ton/yr**
Total Controlled VOC Emissions =	**12.01 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: KMJ Enterprises, Inc.
Address City IN Zip: 720 Ransdell Road, Lebanon, IN 46052
FESOP: F011-11070-00026
Reviewer: PR/EVP
Date: 06/23/99

UNCONTROLLED POTENTIAL EMISSIONS

Material	Maximum Usage Rate (lbs/hr)	Flash Off %	Percent Retained in Rags	Capture System Capture Efficiency (%)	Thermal Oxidizer Destruction Efficiency (%)	Weight % Xylene	Weight % Vinyl Acetate	Weight % Naphthalene	Weight % Glycol Ethers	Weight % Cumene	Xylene Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Cumene Emissions (ton/yr)
Inks	18.47	80.00%	0.00%	100.00%	95.00%						0.00	0.00	0.00	0.00	0.00
Cleaning	1.31	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
Fountain	1.81	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
Inks	35.09	80.00%	0.00%	100.00%	95.00%						0.00	0.00	0.00	0.00	0.00
Cleaning	2.48	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
Fountain	3.45	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
Total State Uncontrolled Potential Emissions											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

TOTAL UNCONTROLLED HAPS	**0.00 Ton/yr**

CONTROLLED POTENTIAL EMISSIONS

Material	Maximum Usage Rate (lbs/hr)	Percent Retained in Substrate	Percent Retained in Rags	Capture System Capture Efficiency (%)	Thermal Oxidizer Destruction Efficiency (%)	Weight % Xylene	Weight % Vinyl Acetate	Weight % Naphthalene	Weight % Glycol Ethers	Weight % Cumene	Xylene Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Cumene Emissions (ton/yr)
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
Total State Controlled Potential Emissions											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

TOTAL CONTROLLED HAPS	**0.00 Ton/yr**

METHODOLOGY

Uncontrolled Emissions (Tons/Year) = Maximum Usage Rate (lbs/hr) * (% HAP) * (1 - %substrate) * (1 - % retained in rags)
Controlled Emissions (Tons/Year) = [Maximum Usage Rate (lbs/hr) * (% HAP) * (1 - %substrate) * (1 - % retained in rags)] * [1 - (% capture efficiency * % control efficiency)]

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: KMJ Enterprises, Inc.
Address City IN Zip: 720 Ransdell Road, Lebanon, IN 46052
FESOP: F011-11070-00026
Reviewer: PR/EVP
Date: 06/23/99

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.4	12.3

Heat Input Capacity includes:
Catalytic Oxidizer #1, with a supplementary fuel heat input rate of 0.54 mmBtu/hr of natural gas
Catalytic Oxidizer #2, with a supplementary fuel heat input rate of 0.864 mmBtu/hr of natural gas

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.05	0.05	0.00	0.61	0.03	0.52

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissi
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton